

**United States Senate**COMMITTEE ON FINANCE  
WASHINGTON, DC 20510-8200

April 21, 2010

**Via Electronic Transmission**

Rhonda M. Medows  
Commissioner  
Georgia Department of Community Health  
State of Georgia  
1 Peachtree Street  
Atlanta, GA 30303

Dear Commissioner Medows:

In the United States, the federal and state governments spend roughly \$317 billion every year on the Medicaid program. As Ranking Member of the Senate Committee on Finance, I have an obligation to ensure that taxpayer dollars are appropriately spent on federal health care programs. Like the Medicare program, Medicaid suffers from systemic weaknesses that lead to fraud, waste, and abuse across the program, resulting in higher costs and less health care to those who are in need. The overutilization of prescription drugs, whether through drug abuse or outright fraud, plays a significant role in the rising cost of our healthcare system. The purpose of this letter is to request information regarding certain outliers in Georgia's Medicaid program and what steps Georgia takes to monitor rates of utilization.

In recent inquiries, I have asked the U.S. Department of Health and Human Services about physicians prescribing mental health drugs at astonishingly high rates. In addition to these concerns, a recent CNN report detailed the increasing abuse of OxyContin, Roxicodone, and Xanax. Specifically, the report described the role some pain management clinics and physicians play in the black market for these drugs. I write today to better ascertain how high rates of both mental health and pain medication utilization are affecting the Medicaid program, as well as how Georgia's rates compare to the national rates.

To that end, please provide charts that list of the top ten Medicaid prescribers of the following drugs for the years 2008 and 2009. For each prescriber, please provide his/her prescriber identifier, and the number of prescriptions written per drug per year, and the total amount billed to Medicaid per drug, separated for each year.

- Abilify;
- Geodon;
- Seroquel;
- Zyprexa;
- Risperdal;

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OFFICE OF THE COMMISSIONER

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- OxyContin;
- Roxicodone; and
- Xanax.

I thank you in advance for your cooperation and request that you provide the requested documents and written responses by no later than May 5, 2010. In your reply, please format information into a chart like the examples provided below. All formal correspondence should be sent electronically in PDF format to [Brian\\_Downey@finance-rep.senate.gov](mailto:Brian_Downey@finance-rep.senate.gov) or via facsimile to (202) 228-2131. Of course should you wish to discuss this matter further, please do not hesitate to contact Christopher Armstrong of my Committee staff at (202) 224-4515.

Sincerely,



Charles E. Grassley  
Ranking Member

Attachment

**Drug X, 2008**

Prescriber Identifier	Total prescriptions	Total billed to Medicaid
123456789	25,000	250,000
234567891	24,000	240,000
345678912	23,000	230,000
456789123	22,000	220,000
567891234	21,000	210,000
678912345	20,000	200,000
789123456	19,000	190,000
891234567	18,000	180,000
912345678	17,000	170,000
012345678	16,000	160,000

**Drug X, 2009**

Prescriber Identifier	Total prescriptions	Total billed to Medicaid
123456789	25,000	250,000
234567891	24,000	240,000
345678912	23,000	230,000
456789123	22,000	220,000
567891234	21,000	210,000
678912345	20,000	200,000
789123456	19,000	190,000
891234567	18,000	180,000
912345678	17,000	170,000
012345678	16,000	160,000



May 5, 2010

Honorable Chuck Grassley  
Ranking Member  
Committee on Finance  
United States Senate  
Washington, DC 20510

Re: Letter of April 21, 2010 to Georgia Department of Community Health

Dear Senator Grassley:

In response to your request of April 21, 2010, the Georgia Department of Community Health has compiled the data set forth in the attached charts for Fee for Services and MCO providers for the medications that you noted. Each of the drugs that were the subject of your request are a part of the Medicaid and MCO formularies. The attached charts include the top ten prescribers identified by prescriber id number and provide the total number of prescriptions and net drug cost.

Utilization review for the Pharmacy program is handled by the Program Integrity Unit. Through a variety of indicators Program Integrity conducts surveillance and monitors for aberrant trends. The response to escalated member utilization may result in a range of responses from pharmacy lock-in to extended provider reviews.

Thank you for the opportunity to provide information to your office. Please contact me if you have any additional requests for information on this matter.

Sincerely,

Gia Compton

Deputy Chief Medicaid Assistance Plans

FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug \*  
January 2008 to December 2009

Abilify				
January 2008 - December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	TODD	ESTROFF	346	\$200,552.65
2	RODDY	INGRAHAM	209	\$77,441.75
3	NATHAN	FEIBELMAN	167	\$70,829.98
4	DORIS	GREENBERG	161	\$63,510.72
5	RICHARD	CARPENTER	151	\$97,019.55
6	KEITH	HALL	142	\$73,335.54
7	RONNIE	BLOUNT	126	\$52,594.65
8	ARVIND	PATEL	120	\$45,486.15
9	JENNIFER	GOULD	104	\$60,226.94
10	RESSY	MATHEWS	103	\$49,264.97

Xanax-Generic				
January 2008-December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	JOHN	SPARTI	1,152	\$10,368.35
2	DOUGLAS	LAIPPLE	743	\$5,762.36
3	SHEL	SHARPE	694	\$7,526.86
4	ALEXANDER	MESKI	664	\$7,593.75
5	NARENDRA	NAGAREDDY	657	\$5,925.30
6	DAVID	SCARBOROUGH	619	\$4,858.96
7	MICHAEL	GLADSON	611	\$5,435.20
8	RONNIE	BLOUNT	569	\$6,730.69
9	ARVIND	PATEL	561	\$4,346.86
10	LUMAWIG	MUNSAYAC	559	\$4,212.46

Abilify				
January 2009- December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	TODD	ESTROFF	288	\$175,783.77
2	DORIS	GREENBERG	239	\$101,465.84
3	THOMAS	MCCORMACK	195	\$61,607.99
4	RODDY	INGRAHAM	184	\$70,075.25
5	SHAHZAD	HASHMI	151	\$75,983.90
6	RONNIE	BLOUNT	149	\$77,883.71
7	NATHAN	FEIBELMAN	131	\$56,176.07
8	RICHARD	CARPENTER	131	\$104,283.11
9	ROY	SANDERS	130	\$45,229.72
10	TIMOTHY	KENNEDY	129	\$42,583.79

Xanax-Generic				
January 2009 - December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	JOHN	SPARTI	1,192	\$10,542.26
2	ALEXANDER	MESKI	937	\$10,757.94
3	NARENDRA	NAGAREDDY	879	\$8,305.42
4	SHEL	SHARPE	865	\$9,446.05
5	HENRY	CLAY	826	\$6,948.33
6	BRYAN	HOOKE	818	\$7,033.04
7	DOUGLAS	LAIPPLE	817	\$6,477.86
8	ARVIND	PATEL	736	\$6,123.68
9	RONNIE	BLOUNT	732	\$9,994.31
10	MICHAEL	GLADSON	640	\$7,494.68

FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug \*  
January 2008 to December 2009

Geodon				
January 2008 - December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	QURESH	BANDUKWALA	485	\$147,068.75
2	DOUGLAS	LAIPPLE	306	\$89,777.64
3	FOSTER	BRIN	280	\$86,159.66
4	OLUFEMI	TAIWO	260	\$64,685.85
5	STAN	BRAVY	251	\$76,292.67
6	ARVIND	PATEL	248	\$77,669.33
7	KENNETH	DI NELLA	230	\$65,754.42
8	MILAGROS	PASCUAL	226	\$73,095.21
9	JENNIFER	GOULD	225	\$59,031.63
10	DAVID	SORKEY	219	\$46,098.23

OxyContin-Brand				
January 2008 - December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	JAMES	SPLICHAL	33	\$21,105.57
2	JOSE	TONGOL	24	\$2,324.63
3	FARIDULLAH	QAZI	23	\$3,704.75
4	CHIRAG	JANI	22	\$912.75
5	SALIM	OSTA	21	\$15,377.23
6	THOMAS	SACHY	20	\$10,901.44
7	THOMAS	NEAL	20	\$4,972.35
8	MELVIN	MOORE	17	\$10,643.37
9	DANIEL	SERRATO	16	\$14,802.24
10	GREGORY	ZAKERS	16	\$7,983.76

Geodon				
January 2009- December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	QURESH	BANDUKWALA	456	\$157,785.34
2	SHAHZAD	HASHMI	403	\$149,847.34
3	FOSTER	BRIN	342	\$117,659.21
4	MILAGROS	PASCUAL	307	\$109,222.50
5	KENNETH	GENOVA	300	\$50,284.03
6	OLUFEMI	TAIWO	297	\$87,800.13
7	DOUGLAS	LAIPPLE	282	\$96,809.07
8	KENNETH	DI NELLA	270	\$85,175.50
9	RONALD	PAOLINI	244	\$84,721.22
10	BARRY	ROZANTINE	234	\$83,964.42

OxyContin-Brand				
January 2009 - December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	CHIRAG	JANI	69	\$3,254.23
2	JOSE	TONGOL	53	\$8,004.37
3	THOMAS	NEAL	33	\$8,705.02
4	JAMES	SPLICHAL	32	\$21,043.45
5	MELVIN	MOORE	31	\$24,290.20
6	ANTHONY	OLOFINTUYI	31	\$13,989.48
7	KELLY	EROLA	30	\$12,768.80
8	SAILAJA	GADDE	30	\$1,127.33
9	ABDULLAH	KUTLAR	28	\$8,625.71
10	ANTONIO	MORAN	28	\$6,381.39

FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug \*  
January 2008 to December 2009

OxyCodone (Generic OxyContin)				
January 2008 - December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	CHIRAG	JANI	49	\$1,200.25
2	ABDULLAH	KUTLAR	30	\$2,909.35
3	JOSE	TONGOL	29	\$1,178.30
4	SAILAJA	GADDE	27	\$613.59
5	THOMAS	NEAL	26	\$2,729.54
6	JOHN	DUELGE	22	\$515.74
7	MELVIN	MOORE	17	\$3,601.18
8	STEPHEN	SZABO	16	\$4,901.72
9	ROBERT	PALMER	16	\$3,786.89
10	KATHLEEN	LONG	15	\$9,995.51

Risperdal				
January 2008 - December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	DORIS	GREENBERG	1,550	\$257,172.95
2	KAREN	CARTER	976	\$173,193.03
3	OLUFEMI	TAIWO	976	\$214,611.51
4	RAINA	SULLIVAN	880	\$205,151.48
5	ANDREW	HURAYT	838	\$177,578.77
6	NARENDRA	NAGAREDDY	774	\$212,424.06
7	ROY	SANDERS	713	\$178,537.99
8	RONNIE	BLOUNT	689	\$215,585.64
9	SHAHZAD	HASHMI	613	\$189,382.88
10	ARVIND	PATEL	604	\$110,384.74

OxyContin-Generic				
January 2009 - December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	CHIRAG	JANI	79	\$2,417.29
2	SAILAJA	GADDE	27	\$795.09
3	JAYANTHI	SRINIVASIAH	19	\$4,552.96
4	CELIA	MAMBY	19	\$3,620.80
5	JOHN	GALLOWAY	17	\$5,020.99
6	JOSE	TONGOL	17	\$1,499.40
7	ROBERT	PALMER	15	\$4,313.86
8	EDWARD	OLEEN	14	\$530.66
9	ALLEN	SLOAN	13	\$2,816.45
10	RAO	MORAVINENI	12	\$4,427.46

Risperdal- Brand				
January 2009 - December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	DORIS	GREENBERG	1,184	\$217,772.88
2	OLUFEMI	TAIWO	1,059	\$266,165.87
3	SHAHZAD	HASHMI	761	\$244,951.55
4	KAREN	CARTER	707	\$145,861.87
5	NARENDRA	NAGAREDDY	666	\$220,855.81
6	ROY	SANDERS	642	\$176,282.68
7	RAINA	SULLIVAN	610	\$166,698.96
8	ANDREW	HURAYT	608	\$147,925.94
9	MEHMOOD	MEHDI	556	\$202,987.61
10	MICHAEL, B	VANDEWALLE	542	\$175,500.58



FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug \*  
January 2008 to December 2009

Risperidone (Generic Risperdal)				
January 2008 - June 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	ARNOLD	NEGRIN	2	\$460.68
2	PATRICIA	JONES-NICE	2	\$344.06
3	THOMAS	MCCORMACK	2	\$172.09
4	EDD	JONES	1	\$388.34
5	SHAHZAD	HASHMI	1	\$320.78
6	MARLA	MICHAELS	1	\$308.02
7	JOSEPH	SORENSEN	1	\$307.33
8	DAVID	HARTLEY	1	\$234.14
9	RAMESH	AMIN	1	\$224.05
10	MARY	EASTERLING	1	\$214.22

Risperdal-Generic				
January 2009 - December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	DORIS	GREENBERG	407	\$24,896.84
2	OLUFEMI	TAIWO	341	\$19,163.23
3	NARENDRA	NAGAREDDY	243	\$13,924.30
4	ROY	SANDERS	239	\$14,454.30
5	KAREN	CARTER	221	\$10,926.86
6	SHAHZAD	HASHMI	212	\$12,788.86
7	RAINA	SULLIVAN	181	\$10,415.16
8	ANDREW	HURAYT	177	\$8,061.28
9	ARVIND	PATEL	166	\$8,347.21
10	MEHMOOD	MEHDI	160	\$9,481.50

Seroquel				
January 2008 - December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	KENNETH	DI NELLA	1,142	\$383,230.92
2	ANDREW	HURAYT	808	\$202,611.76
3	JOHN	BEATY	771	\$259,239.63
4	MANOJ	DASS	729	\$230,318.57
5	MICHAEL	GLADSON	655	\$158,314.96
6	OLUFEMI	TAIWO	651	\$183,644.24
7	MICHAEL, B	VANDEWALLE	623	\$216,761.76
8	DOUGLAS	LAIPPLE	613	\$211,183.89
9	SHAHZAD	HASHMI	613	\$175,733.04
10	KEISHA	BROWN	562	\$151,781.98

Seroquel				
January 2009- December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	SHAHZAD	HASHMI	1,277	\$390,357.32
2	KENNETH	DI NELLA	1,033	\$357,671.10
3	SASI	NAYUDU	808	\$248,126.32
4	MICHAEL	GLADSON	794	\$218,762.89
5	OLUFEMI	TAIWO	779	\$251,105.07
6	MICHAEL, B	VANDEWALLE	767	\$330,205.44
7	JOHN	BEATY	679	\$292,851.03
8	ANDREW	HURAYT	639	\$177,704.90
9	MANOJ	DASS	620	\$228,062.14
10	KENNETH	GENOVA	592	\$127,312.76

FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug \*  
January 2008 to December 2009

Roxicodone				
January 2008 - December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	DAWNETTA	HOLLADAY	7	\$564.43
2	CHIRAG	JANI	7	\$55.83
3	ALICE	DAVID	5	\$251.85
4	REGINALD	HALL	4	\$66.26
5	RAHIM	GUL	4	\$60.86
6	JEREMY	WELLS	3	\$267.06
7	ALVIN	STREAT	3	\$255.76
8	HUSHANG	MEMAR	3	\$156.97
9	NARESH	PARIKH	3	\$91.58
10	KILEY	REYNOLDS	2	\$222.98

Roxicodone-Generic				
January 2008 - December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	ROGER	NUNN	244	\$21,349.05
2	DANIEL	KATZ	193	\$9,377.01
3	KERRY	NAGEL	187	\$17,327.32
4	RASEAN	HODGE	164	\$9,185.73
5	KIMBERLY	GREEN	142	\$6,568.42
6	ANGELA	MUHAMMAD	132	\$6,378.26
7	THOMAS	SACHY	128	\$11,165.80
8	BRENT	BEAIRD	128	\$1,185.41
9	DARL	RANTZ	127	\$7,609.19
10	SACKDINANH	KEOMAHATHAI	119	\$6,808.29

Roxicodone-Brand				
January 2009 - December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	WILLIAM	TAYLOR	9	\$624.46
2	KEVIN	KEOWN	6	\$148.32
3	TERENCE	FRINKS	5	\$81.07
4	MARK	LIPHAM	5	\$23.09
5	STEVEN	LUCKS	4	\$983.04
6	HARVEY	LESLIE	4	\$965.18
7	JULIUS	ODERINDE	3	\$759.05
8	VICKIE	JAMES	3	\$56.06
9	TIMOTHY	PALMER	2	\$415.26
10	DAWNETTA	HOLLADAY	2	\$214.83

Roxicodone-Generic				
January 2009 - December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	RAHIM	GUL	403	\$30,161.53
2	ROGER	NUNN	267	\$41,794.29
3	KERRY	NAGEL	223	\$24,920.02
4	SANFORD	LEFFINGWELL	161	\$13,720.16
5	DARL	RANTZ	160	\$18,614.06
6	RASEAN	HODGE	156	\$15,272.76
7	MARK	ELLIS	131	\$14,968.72
8	KIMBERLY	GREEN	130	\$10,274.53
9	DAWNETTA	HOLLADAY	124	\$10,472.59
10	KAREN	AVERY	120	\$7,852.33

FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug \*  
January 2008 to December 2009

Zyprexa				
January 2008 -December 2008				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	EDWARD	AJAYI	391	\$245,475.11
2	JOHN	BEATY	288	\$171,894.87
3	ANTHONY	NEALY	215	\$159,290.44
4	NARENDRA	NAGAREDDY	208	\$110,509.01
5	KEITH	HALL	187	\$88,877.20
6	MEHMOOD	MEHDI	182	\$119,061.47
7	RONALD	PAOLINI	180	\$101,472.42
8	HECTOR	AVILES	166	\$111,428.69
9	SHAHZAD	HASHMI	165	\$85,019.13
10	THOMAS	RUMBLE	158	\$88,208.57

Zyprex				
January 2009- December 2009				
Rank	First Name	Last Name	Total Rxs	Net Drug Cost
1	EDWARD	AJAYI	353	\$265,154.48
2	NARENDRA	NAGAREDDY	338	\$163,348.12
3	JOHN	BEATY	281	\$179,988.46
4	SHAHZAD	HASHMI	268	\$165,653.93
5	MEHMOOD	MEHDI	242	\$148,840.92
6	RONALD	PAOLINI	208	\$122,974.22
7	IVERSON	BELL	198	\$112,127.33
8	HANY	ELIA	190	\$128,024.09
9	MONA	HANNA	177	\$111,727.32
10	OLUFEMI	TAIWO	168	\$113,367.46

PATRICK J. LEAHY, VERMONT, CHAIRMAN

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**United States Senate**

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

BRUCE A. COHEN, *Chief Counsel and Staff Director*  
KOLAN L. DAVIS, *Republican Chief Counsel and Staff Director*

January 23, 2012

**VIA ELECTRONIC TRANSMISSION**

David A. Cook  
Commissioner, Department of Community Health  
Two Peachtree Street, NW, 40th Floor  
Atlanta, GA 30303

Dear Commissioner Cook,

Your state provided my office with data regarding the top ten prescribers of several pain management and mental health drugs in your state. These types of drugs have addictive properties, and the potential for fraud and abuse by prescribers and patients is extremely high. Mental health drugs continue to be prescribed at astounding rates and pain management clinics are turning into a hotbed for black market painkillers. When these drugs are prescribed to Medicaid patients, it is the American people who pay the price for over-prescription, abuse, and fraud.

After an extensive review of prescribing habits of the serial prescribers of pain and mental health drugs in your state, I have concerns about the oversight and enforcement of Medicaid abuse in your state. While I am sensitive to the concerns of misinterpretation of the data you provided, the numbers themselves are quite shocking.

For example in 2009, the top prescriber of OxyContin prescribed more than triple the second provider on the list and more than six times the tenth prescriber. These outliers are consistent with several of the antipsychotic drugs as well—with the top prescribers writing double or triple the number of prescriptions as the other prescribers on the list.

It is my intention to ensure that each of the states is adequately monitoring, investigating, and stopping fraud and over-prescription of these types of drugs. Therefore, please provide answers to the following questions:

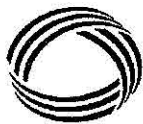
1. What action, if any, has your agency taken with respect to the prescribers identified to the Committee?
2. If there has been no action taken with respect to these prescribers, please explain why not.
3. Please identify which of the providers identified to the Committee, remain eligible to bill the Medicaid Program.
4. Please provide the 2010 and 2011 numbers for the top prescribers of these same drugs.
5. Has each of these prescribers been cross-checked for complaints or misconduct with the state medical board or the National Practitioner Data Bank? If not, do you plan to do so?
6. Have any of the prescribers identified to this Committee been referred to your state medical board?
7. Is there any system set up in your state to identify and monitor excessive prescription writing? If not, why not?
8. Have you received any training or guidance from the Centers for Medicare and Medicaid Studies to help identify potential issues with prescription drugs?
9. Does your state maintain a database of all prescribed controlled-substances? If so, what entities have access to it?
10. Does your state have any point-of-sale restrictions related to maximum units, prior authorization, therapeutic duplication, or early refill? If not, why not?
11. Were any of these top ten prescribers identified in the federal-mandated Drug Utilization Review or CMS-base retrospective reviews?
12. Does your state have any programs in place to educate providers about the prescription of antipsychotics to children and adolescents?

Thank you in advance for your cooperation and attention in this matter. When responding to this letter, please number your answers in accordance with my questions. I would appreciate a response by February 13, 2012. If you have any questions, please do not hesitate to contact Erika Smith of my staff at (202) 224-5225.

Sincerely,

A handwritten signature in blue ink that reads "Chuck Grassley". The signature is written in a cursive, flowing style.

Charles E. Grassley  
Ranking Member  
Committee on the Judiciary



February 10, 2012

VIA ELECTRONIC TRANSMISSION

The Honorable Charles E. Grassley  
United States Senator, Iowa  
135 Hart Senate Office Building  
Washington, DC 20510

Dear Senator Grassley,

Thank you for giving the Georgia Department of Community Health (DCH) the opportunity to share our efforts in monitoring the prescription of pain management and mental health drugs to Georgia citizens who depend on our health care services. Through the Medicaid and Children's Health Insurance Programs, the department provides healthcare coverage for nearly 1.7 million Georgians. We share your concerns about adequate monitoring, investigation, over-prescription, and fraud. Within DCH, the Office of Inspector General (OIG) is responsible for maintaining the integrity of our medical assistance programs. Our Inspector General, in partnership with the Medicaid pharmacy program and the State Medicaid Fraud Control Unit within the Georgia Department of Law, employs a broad range of investigative and analytic methods in order to safeguard the integrity of Georgia Medicaid. By rigorously monitoring and auditing Georgia Medicaid providers and recipients to uncover criminal conduct, fraud and other abuses, we enhance our ability to provide appropriate clinical services in a fiscally sound manner. In response to the specific issues raised in your letter, I hope you find the information below and included in the attachment responsive.

1. The following table illustrates a contract status breakdown of the Georgia Medicaid prescribers identified to the Judiciary committee in 2010:

Table 1 – Summary of Previously Identified Serial Prescribers Contract Status

CONTRACT STATUS	NUMBER OF PRESCRIBERS
ACTIVE	89
TERMINATED	16
NON-MEDICAID	7
<b>TOTAL:</b>	<b>112</b>

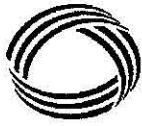




**GEORGIA DEPARTMENT  
OF COMMUNITY HEALTH**

2. We have taken action with respect to certain serial prescribers, eliminating 16 from our programs.
3. An analysis of the attachment will illustrate which providers identified to the Committee in the previous report will reveal which are still participating providers in Georgia Medicaid.
4. Please see the attachment which provides a breakdown of the top 10 prescribers by volume by drug from January 2010 to December 2011. Please note the methodology listed at the bottom of the attachment.
5. No, the department does not have a formalized process for cross-checking provider complaints or allegations of misconduct with the Composite State Medical Board. Pursuant to O.C.G.A. 43-34-8 (d) the records and investigations of the Composite Medical Board are sealed and privileged, although the department does work with the Composite Medical Board once an investigation becomes a matter of public record. We are currently evaluating options for working with the National Practitioner Data Bank on information sharing.
6. No, the department has not referred the prescribers who were previously identified to the Judiciary Committee to the Composite State Medical Board for action.
7. We are proud of the proactive programs we have in place to detect and prevent over-medication and prescription abuse. The Georgia Medicaid pharmacy and physician Lock-In programs, operational since 2006, prevent members from obtaining excessive quantities of controlled substances through “doc shopping” multiple physicians and pharmacies and help control against duplicative and inappropriate therapeutic regimes. Both programs allow one pharmacy and one physician to monitor the number of prescriptions a beneficiary is filling, and to intervene if necessary. Patients meeting predefined criteria are placed in the Lock-In program for a two-year period, after which time they are reviewed every six months for re-emerging patterns of abuse. The program generated an estimated savings of nearly \$500,000 for State Fiscal Year 2010.
8. The department is continually looking for ways to improve its monitoring of prescription drugs and over-medication. We leverage contractual relationships with the Managed Care Organizations (MCOs) in Georgia to observe trends and discuss any provider that may be in-network across multiple plans. Furthermore, the department has entered into an agreement to participate in the Medi-Medi program offered by the Centers for Medicare and Medicaid Services. This program provides a matched database of claims for Medicare and Medicaid and gives line of sight across both populations with the advantages of a larger data set. The Medi-Medi program participants in Georgia meet quarterly to review outlier data, discuss patterns, and highlight trends. We also recently received communication from the United States





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Department of Health and Human Services (HHS) regarding a collaborative effort between the Administration for Children and Families (ACF), the Centers for Medicare and Medicaid Services (CMS), and the Substance Abuse and Mental Health Services Administration (SAMHSA) to offer expanded opportunities to states to strengthen their systems of prescribing and monitoring psychotropic medication use among children in foster care. We look forward to learning more about this effort and participating with the agencies to better manage the health outcomes of Georgia's foster children.

9. Last year the Georgia General Assembly enacted and Governor Deal signed into law Act # 229, which gave the Georgia Drug and Narcotics Agency the authority to establish an electronic database "to assist in the reduction of the abuse of controlled substances, to improve, enhance, and encourage a better quality of health care by promoting the proper use of medications to treat pain and terminal illness, and to reduce duplicative prescribing and overprescribing of controlled substance practices."<sup>1</sup> O.C.G.A. 16-13-60(c) limits access to the database to the following:
  - (1) To persons authorized to prescribe or dispense controlled substances for the sole purpose of providing medical or pharmaceutical care to a specific patient;
  - (2) Upon the request of a patient, prescriber, or dispenser about whom the prescription information requested concerns or upon the request on his or her behalf of his or her attorney;
  - (3) To local, state, or federal law enforcement or prosecutorial officials pursuant to the issuance of a search warrant pursuant to Article 2 of Chapter 5 of Title 17; and
  - (4) To the [Georgia Drug and Narcotics] agency or the Georgia Composite Medical Board upon the issuance of an administrative subpoena issued by a Georgia state administrative law judge.
10. The department has a number of procedures in place to control access to pain management and mental health drugs. All of the drugs listed in the attached 2010-2011 report are subject to early refill, quantity limits, and therapeutic duplication edits. All drugs except Roxicodone and Xanax require a Prior Authorization (PA). Additionally, the department implemented a prior authorization program on Oct. 1, 2011 for children receiving atypical antipsychotics outside of the FDA-approved age ranges
11. In 2011, two retro-Drug Utilization Review interventions were implemented that impacted these providers. In the first quarter of 2011, we intervened with eight providers regarding high dose Zyprexa. In the third quarter, we intervened with thirty-seven providers regarding children who receive atypical antipsychotics outside of the FDA-approved age ranges for those drugs.

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<sup>1</sup> OCGA 16-13-57 (a); Effective date July 1, 2011



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12. Yes, both the collaborative effort with US HHS, ACF, and SAMHSA, and the Prior Authorization requirement described above at #8 and # 10 speak to these efforts. The department has also worked with mental health professionals and legislative leaders in the General Assembly to begin to address the problems posed by the use of atypical antipsychotic and psychotropic drugs in the therapeutic regimes of children and adolescents.

An individual's mental and behavioral health is a crucial component to their overall well-being. We are committed to ensuring that Medicaid members receive the proper treatment required to improve their health outcomes, resulting in a healthier population and lower health care costs overall. We are currently undertaking a comprehensive assessment and redesign of Georgia's Medicaid and CHIP program. Mental health treatment and pharmacy issues are a major component of that discussion. We take a forward- looking approach to continually improving our efforts to provide the best quality services to our members while ensuring value to taxpayers.

Thank you again for your interest in our programs, and for your dedicated service to our nation. We look forward to answering any further questions you may have and to working with you on these and other issues that may arise.

Respectfully,

David A. Cook  
Commissioner

FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug  
January 2010 to December 2011

Abilify		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1992921126	305	\$180,564.89
1760517254	265	\$157,221.52
1194834218	261	\$125,333.15
1225005598	205	\$106,861.07
1396718698	179	\$90,584.79
1578570818	176	\$82,414.22
1619092012	173	\$97,655.27
1467558619	172	\$93,128.83
1427037514	167	\$86,055.05
1740298728	164	\$64,146.83

Abilify		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1992921126	545	\$296,071.97
1194834218	265	\$142,915.91
1760517254	256	\$177,221.25
1578570818	247	\$127,575.45
1629191663	205	\$121,305.88
1831142546	184	\$122,043.36
1215121116	176	\$111,807.92
1770566341	162	\$96,509.91
1225005598	159	\$97,786.33
1437180957	158	\$102,203.47

alprazolam (generic Xanax)		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1003999186	1,224	\$11,513.41
1598859498	1,194	\$11,600.78
1386613537	1,138	\$9,693.25
1205874468	1,087	\$13,100.76
1508956558	982	\$10,577.99
1033226220	896	\$7,760.07
1083600605	864	\$7,906.26
1720159098	812	\$12,007.71

alprazolam (generic Xanax)		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1003999186	1,597	\$16,340.17
1598859498	1,394	\$13,630.70
1992883201	1,226	\$10,483.36
1386613537	1,174	\$9,965.37
1205874468	1,070	\$13,089.05
1508956558	1,032	\$10,718.92
1205876000	960	\$8,601.12
1033226220	921	\$8,035.14

FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug  
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1205876000	726	\$6,194.33
1881622314	704	\$5,130.30

1083600605	802	\$7,174.93
1881622314	769	\$5,795.89

Geodon		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1396718698	446	\$173,522.63
1770566341	400	\$161,505.36
1124170097	397	\$158,328.72
1225005598	325	\$113,135.92
1942284468	306	\$101,620.99
1992921126	305	\$109,882.85
1083701312	255	\$102,586.13
1427037514	250	\$101,528.99
1922017987	220	\$90,995.48
1821095159	211	\$92,450.83

Geodon		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1942284468	476	\$179,439.64
1770566341	431	\$186,318.64
1396718698	417	\$157,211.00
1629191663	366	\$186,481.82
1124170097	315	\$145,202.34
1225005598	265	\$104,992.04
1487711024	256	\$42,926.47
1205876000	247	\$83,919.56
1053408310	239	\$98,403.07
1265644207	231	\$106,299.52

Oxycontin-Brand		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1477525624	128	\$5,435.23
1871565036	63	\$8,878.38
1821034505	60	\$4,363.30
1780717231	58	\$14,097.41
1780793349	47	\$15,882.97
1588619142	46	\$24,453.43
1437137015	41	\$16,862.42

Oxycontin-Brand		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1477525624	98	\$4,613.96
1780717231	69	\$19,895.34
1871565036	49	\$5,503.07
1780793349	39	\$12,860.52
1588619142	36	\$21,521.60
1649241829	33	\$2,433.88
1174725345	31	\$17,892.66

FFS Georgia Medicaid Program  
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1669584447	27	\$9,784.43
1407877590	25	\$7,622.88
1114960382	24	\$22,275.06

1922106897	31	\$2,176.12
1821034505	31	\$1,875.52
1437137015	26	\$12,110.54

oxycodone (generic OxyContin)		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1093789075	9	\$5,262.30
1255319752	9	\$1,510.90
1780793349	9	\$1,369.59
1114119369	7	\$2,306.43
1013010487	7	\$238.60
1437137015	5	\$2,633.09
1811909146	5	\$1,540.65
1770769234	3	\$1,327.43
1962495234	3	\$973.17
1588656250	3	\$928.95

oxycodone (generic OxyContin)		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1093988487	4	\$1,779.24
1972601839	4	\$177.96
1871565036	4	\$162.88
1124016910	3	\$936.33
1922106897	3	\$417.66
1780793349	3	\$176.76
1033228671	2	\$667.82
1699770065	2	\$616.76
1174688121	2	\$25.57
1720174873	1	\$870.51

Risperdal-Brand		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1679527709	22	\$8,628.38
1689740987	21	\$2,653.87
1275699514	13	\$2,036.84
1235193582	9	\$8,028.91
1205964269	9	\$2,965.61
1245274034	8	\$2,689.22

Risperdal-Brand		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1679527709	36	\$7,031.88
1205964269	26	\$10,441.25
1346269172	12	\$3,870.09
1457579492	12	\$1,580.03
1699899443	7	\$1,081.97
1235193582	6	\$4,520.28

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1003012915	8	\$1,725.96
1699899443	7	\$1,128.40
1023085420	6	\$5,244.90
1346269172	6	\$1,713.30

1629038179	6	\$643.34
1215991757	5	\$5,650.35
1700966181	5	\$1,301.08
1184696817	4	\$3,893.99

risperidone (generic Risperdal)		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1225005598	1,679	\$68,613.19
1194834218	1,567	\$78,084.97
1598859498	1,029	\$38,783.62
1043423023	958	\$44,014.58
1528074101	943	\$53,641.98
1770753089	922	\$31,417.81
1427037514	808	\$38,306.48
1770566341	756	\$33,741.74
1902845498	745	\$32,224.16
1033226220	716	\$26,335.11

risperidone (generic Risperdal)		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1225005598	1,662	\$42,321.02
1194834218	1,263	\$36,901.44
1992833099	1,256	\$29,670.70
1598859498	1,187	\$29,152.38
1043423023	956	\$28,644.28
1629191663	920	\$22,099.22
1770753089	919	\$26,985.73
1528074101	800	\$25,764.21
1770566341	737	\$20,628.97
1427037514	732	\$22,026.66

Seroquel		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1992921126	736	\$290,720.13
1770566341	719	\$272,101.09
1679573695	668	\$208,249.30
1225005598	659	\$262,221.12
1629191663	648	\$366,751.10

Seroquel		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1376765180	746	\$280,131.92
1629191663	737	\$439,087.79
1770566341	735	\$325,875.07
1992921126	662	\$274,564.36
1033282017	644	\$288,361.99

FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug  
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1376765180	612	\$186,889.22
1831227487	548	\$264,707.44
1548239148	523	\$123,072.08
1942284468	508	\$194,336.89
1033282017	503	\$186,636.22

1598859498	541	\$230,295.23
1831227487	538	\$275,137.34
1225005598	537	\$223,727.96
1831273036	517	\$172,692.45
1831142546	501	\$191,501.75

roxicodone-Brand		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1043409246	1	\$413.28

roxicodone-Brand		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
	0	

(oxycodone-generic roxicodone)		
January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1992883201	404	\$31,471.72
1376589119	331	\$32,152.36
1700814571	324	\$25,252.20
1972543726	295	\$31,567.36
1588783039	263	\$21,313.94
1144487018	224	\$12,693.90
1073739579	222	\$13,856.05
1487638169	218	\$17,775.81
1073739579	213	\$22,755.03
1043409246	195	\$21,177.54

(oxycodone-generic roxicodone)		
January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1992883201	680	\$31,643.31
1073739579	531	\$26,426.92
1235237546	403	\$10,942.58
1649228420	398	\$23,247.85
1437105558	332	\$14,723.75
1588783039	329	\$16,173.93
1841260684	312	\$12,612.33
1194858613	282	\$14,510.38
1073840864	227	\$10,674.43
1639156532	219	\$13,456.72

Zyprexa
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Zyprexa
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FFS Georgia Medicaid Program  
Top 10 Doctors by Volume - by Drug  
January 2010 to December 2011

January 2010 - December 2010		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1598859498	451	\$298,870.56
1285649707	330	\$272,058.13
1396718698	322	\$190,637.23
1770566341	252	\$161,677.71
1922017987	233	\$162,693.66
1629191663	185	\$141,975.53
1225005598	185	\$124,601.55
1881603553	179	\$155,143.98
1427037514	171	\$141,236.66
1073529046	167	\$106,420.69

January 2011 - December 2011		
Prescriber NPI	Claims Count	Pharmacy Due Amount (Total amount Medicaid paid)
1598859498	556	\$457,352.62
1285649707	299	\$286,059.13
1770566341	278	\$199,283.75
1396718698	250	\$172,760.70
1922017987	248	\$218,279.05
1629191663	239	\$227,630.94
1508044520	185	\$152,885.66
1881603553	170	\$167,486.49
1952495236	164	\$125,806.29
1538164173	158	\$122,094.86

RxTrack query of all medications to retrieve all GPIs.

Excel spreadsheet filtered for only those medications names requested in the media inquiry/Grassley letter.

These identified GPIs were listed as a condition in RxTrack claims query to identify the top 10 prescribers per medication based upon claim count for 2010 and 2011.

Risperdal Consta was neither included in this analysis nor the 2008-2009 data analysis.

Oxycodone 5mg capsules were included in this analysis but not in the 2008-2009 data analysis.